

**Linda Range**

**From:** Linda Range  
**Sent:** Thursday, February 19, 2015 12:09 PM  
**To:** 'tjho.sin-kie@epa.gov'  
**Cc:** 'singh.sharissa@epa.gov'  
**Subject:** FW: DuPont RFI content "pre-comments" slightly amended

Sin-Kie – Sorry, I've got slightly tweaked comments to yesterday's comment administrative content email on the RFI. Changes are in color. The most important is that involving the actual wording for the requested 3D ground water maps! As you can see from both emails, we very much feel 3D maps of the ground water contamination are vital to a better understanding of this complex hydraulic system, and in this case, a reasonable request. Any questions, let me know!

**From:** Linda Range  
**Sent:** Wednesday, February 18, 2015 4:26 PM  
**To:** 'tjho.sin-kie@epa.gov'  
**Subject:** DuPont RFI content "pre-comments"

Sin-Kie,

As we discussed, you requested informal comments as to what information should be incorporated into the RFI to more closely reflect DEP requirements. Additional, more technical comments will be provided at a later date, and once the below additional information is provided. Any questions, let me know.

- At least one hard copy of ALL material is required by the DEP for the case file; appendices are currently in electronic format only
- Figures – Soil - although providing a valuable overview of data, figures (both soils and ground water) are inadequate for AOC/SWMU detail. Similar to those figures submitted with the *Tech Memo of May 2013* (which did not include DataGap / final RI sampling data), soil sample location figures are to be submitted, at minimum, one for each AOC and one for each SWMU not contained within an AOC, with all sample locations, sample depths and all exceedences plotted. (Some may require more than one figure each; SWMU 17/17A, for example will likely require one figure per section.) Without same, the reviewer is unable to adequately confirm completion of delineation efforts, nor evaluate those levels of contamination remaining. The Tech Memo included separate figures for soils exceedences of Impact to Ground Water versus exceedences of Non-Residential standards; these may/should be combined (with color coding or similar to differentiate).
- Figures – soil - Isopleth maps for soils exceedences to accompany these figures (perhaps per contaminant category?) may be beneficial; isopleth maps for AOCs with greater than 25 sample locations are actually required per NJAC 7:26E-1.6(b)8ii(3) of the Tech Regs
- Figures – Groundwater – As above, isopleth maps should have been submitted; there are far more than 25 sample locations. Due to the complex geology of the site, its numerous aquifers and intervening confining units, and the need to better understand the dynamics of contaminant migration between the various hydrostratigraphic horizons, the DEP is requesting the submittal of figures based on the results of 3D ground water modeling. At a minimum, the figures should illustrate and clarify the hydrostratigraphy, contaminant concentrations (i.e., isopleth maps) within each hydrostratigraphic unit, ground water sampling locations and depths, and the vertical and lateral flow components of the primary ground water contaminant of concern (COC) plumes.

- Tables – soils – tables should not be segregated by Impact to Groundwater versus Non-Residential; a column should be added to incorporate the second of standards/criteria, and any exceedences color coded to differentiate
- Tables – soils – units should be reported in milligrams per kilogram (ppm) for soil
- Fact Sheets – should include dates of any designation of NFA by DEP
- Fact Sheets – note that any soil result above residential criteria/standard requires an institutional control; above non-res requires engineering controls. Some of the sheets appear to be worded otherwise
- Fact Sheets – should include discussion of any interim remedial actions, and additional descriptions of any remedial actions. The inclusion of a list of COCs with no associated results provides inadequate information. Most also recommend NFA with insufficient discussion as to why levels (MANY results are significantly above IGW, as well as NonRes) are of no concern; was the Attainment/Compliance Guidance Document somehow met, was compliance averaging used? The levels of soil contamination remaining in many areas appear to represent continuing source material which do not support the proposal for no further action at this time.

## **Linda Range**

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**From:** Linda Range  
**Sent:** Thursday, January 15, 2015 4:08 PM  
**To:** 'tjho.sin-kie@epa.gov'  
**Cc:** oconnell.Kim@epa.gov; Jeff Griesemer; Allan Motter; Steve Byrnes  
**Subject:** DuPont RFI

Sin-Kie,

We will be providing more formal comments once our review is completed, however, as requested, here are some initial points I wanted to share following initial review, and before our meeting with the facility.

- This office does not grant NFAs any longer
- Regardless, the information provided is insufficient to support a recommendation for nfa of soils. Particularly in the mfg area. As the report indicates, COCs are present above the nonresidential standard, although the figures 7-1 thru 7-3 indicate only "exceedance" or "no exceedance". This does not allow for determination of what contaminants are where, at what depths, to what levels, and whether certain areas should be addressed/remediated as they are acting as continuing sources to ground.
- The figures provide a very broad overview, which in itself is beneficial, but should be supported by AOC/SWMU specific data as well
- Isopleth maps should have been included, for all media
- Although I have a copy of an October '02 NFA letter for 17 AOCs, I did not review historic files and am therefore not commenting on/confirming the "NFA" status of the other 65 AOCs referenced in Figures 2-2 and 2-3 as being NFAed.
- It was my understanding the ditches underwent remediation via soils excavation several years ago, however, it was not completed, and was to be revisited at a later time. I may have missed it in my preliminary review, but did not see this referenced?
- Certain of the Fact Sheets contained in the Appendix CD (the Appendix should have been submitted in hard copy as well as electronic) reference the DEP & EPA agreed to NFA individual AOCs/SWMUs, but do not include dates for same. Tracking is therefore problematic.

I'm out of the office tomorrow, but look forward to seeing you on Tuesday.

